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From: Manzanilla, Enrique Sent: Fri 6/6/2014 7:25:05 PM

Subject: TCE related documents you requested MAIL_RECEIVED: Fri 6/6/2014 7:24:00 PM OEA recommendations TCE dec 2012.pdf EPA Region 9 South Bay VI Letter 12-3-13.pdf

DRAFT R9 TCE Short-term ALs Memo Clean_131113.doc

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Enclosed are the documents you requested.

Following is an abbreviated time line with regard to these documents. #'s 2, 3 and 4 have circulated publicly. Our Region 9 Draft guidance (#5) is just that – Draft.

The IRIS toxicity review on TCE was finalized and posted in September 2011. One of the critical effects used to derive the non-cancer reference concentration (RfC) was fetal heart defects from the mothers exposure during the first trimester. This sensitive population is not a chronic condition which prompted discussion between the Regions and ORD about the interpretation and application of short-term exposure levels.

- 1. MEW Superfund site Responsible Parties react to Region 9's interpretation of the toxicity information and the potential for short-term expedited responses. The MEW RPs submit a "white paper" to EPA HQ in June 2012 on their interpretation and suggested responses for the short-term TCE issue.
- 2. The Region 10 guidance from their Office of Environmental Assessment (OEA) dated December 2012. This Regional memo presents the short-term concern and applicable screening levels in the same format as the Regional Screening Levels (RSLs).
- 3. Region 9 presents the short-term concern from TCE, among other issues, to the San Francisco Bay Regional Water Quality Control Board who is overseeing several NPL sites in south SF bay area. This letter is dated December 2013 and while it incorporates the RSL values similar to Region 10 it also addresses risk management concerns of expedited time frame of responses when the indoor air concentrations exceed the screening levels.

4. Massachusetts Department of Environmental Protection issues their guidance on TCE vapor intrusion concerns in March 2014. This guidance uses the same screening levels but goes into greater explanation of what the State defines as an "Imminent Hazard" and the procedures to be followed as far as notification and expedited responses. The technical fact sheet is attached. http://www.mass.gov/eea/docs/dep/cleanup/laws/tcestat.pdf

Mass DEP also has a residential fact sheet for the public which clearly explains the concerns for homeowners. http://www.mass.gov/eea/docs/dep/cleanup/laws/tceresin.pdf

5. Region 9 **Draft** guidance on short-term exposures to TCE. This is intended as a technical direction to Regional RPMs on the short-term concern from TCE exposure and like several of the other documents addresses the risk management issues of the time period to take expedited actions when screening levels are exceeded.

Thank	you	for	your	help.

Enrique